

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor U.S. BANK NATIONAL ASSOCIATION	CASE NO.: 13-37796-JNP CHAPTER 13 HEARING DATE: March 19, 2019 JUDGE: Judge Jerrold N. Poslusny Jr.
In Re: Anthony R Alphonse, Debtor, Jamie M. Alphonse, aka Jamie Graf, Joint Debtor.	

RESPONSE TO MOTION TO DEEM MORTGAGE CURRENT

U.S. BANK NATIONAL ASSOCIATION (“Secured Creditor”), by and through its undersigned attorney, hereby files its Response to Debtor’s Motion to Deem Mortgage Current and in support thereof states as follows:

1. Debtors filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on December 26, 2013.
2. Secured Creditor holds an interest in Debtor’s real property located at 322 Collins Lane Maple Shade, New Jersey 08052.
3. On February 25, 2019, Debtor filed a Motion to Deem Mortgage Current (DE # 54).
4. According to Secured Creditor’s records, the Debtor is due for the March 1, 2019 post-petition payment.
5. Secured Creditor reserves the right to supplement its Response to Debtor’s Motion to Deem Mortgage Account Current any time before or at the hearing.

WHEREFORE, Secured Creditor respectfully requests that the Court Deem Debtor's Motion as Moot and for such other and further relief as this court deems just and proper.

ROBERTSON, ANSCHUTZ & SCHNEID, P.L.
Attorney for Secured Creditor
6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Telephone: 561-241-6901
Facsimile: 561-241-1969

By: /s/ Harold N. Kaplan
Harold N. Kaplan, Esquire
Bar ID: HK0226
Email: hkaplan@rasnj.com

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor U.S. BANK NATIONAL ASSOCIATION ATTY NAME	CASE NO.: 13-37796-JNP CHAPTER 13 HEARING DATE: March 19, 2019 JUDGE: Jerrold N. Poslusny Jr.
In Re: Anthony R Alphonse, Debtor, Jamie M. Alphonse, aka Jamie Graf, Joint Debtor.	

CERTIFICATION OF SERVICE AND PROOF OF MAILING

I, Harold Kaplan, Esq.:

☒ represent the movant in the above-captioned matter.

☐ am the secretary/paralegal for _____, you represent the _____
in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

On 3/12/2019 I caused to be sent a copy of the following pleadings and/or documents to the
parties listed in the chart below: Response to Debtor's Motion to Deem Mortgage Current.

I hereby certify under penalty of perjury that the above documents were sent using the mode of
service indicated.

Dated: 3/12/2019

By: /s/ Harold N. Kaplan
Harold N. Kaplan, Esquire
Bar ID: HK0226
Email: hkaplan@rasnj.com

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Lee Martin Perlman Lee M. Perlman 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Debtor(s) Attorney	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Anthony R Alphonse 322 Collins Lane Maple Shade, NJ 08052 Jamie M. Alphonse 322 Collins Lane Maple Shade, NJ 08052	Debtor(s)	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.